

Exhibit B

December 20, 2023 Email

From: Ashley, Matt <MAshley@irell.com>
Sent: Wednesday, December 20, 2023 10:46 PM
To: Prabhakar, Saurabh
Cc: Weber, Olivia; Cheryl G. Rice; John L. Wood; Extreme; Leslie A. Demers; jessica.malloy-thorpe@millermartin.com; jordan.scott@millermartin.com; Chuck Lee
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Saurabh,

Without going into all of the below (and reserving all rights), Extreme *already agreed* to produce a witness as to topics 13 and 14 (see its Nov. 20 responses and objections), and we told Extreme on the December 12 call that we were fine with Extreme's response to those two topics. So it seems we have agreement on them as well. Please confirm that tonight so we can inform the Court of the parties' agreement.

As for topics 7, 9 and 26, we discussed them at length on our meet and confer calls, including why Extreme's re-crafting of our requests was improper. So we do not agree on them, and we expect Extreme to abide by what we discussed on the meet and confer calls.

Also, you say "January 15 and thereafter." How far past January 15 "thereafter" (and I mean every witness designated as to every topic that Extreme has now finally agreed to produce a witness for, including topics 13-14)? Please let us know tonight.

Matt

From: Prabhakar, Saurabh <sprabhakar@debevoise.com>
Sent: Wednesday, December 20, 2023 5:19 PM
To: Ashley, Matt <MAshley@irell.com>
Cc: Weber, Olivia <oweber@irell.com>; Cheryl G. Rice <CRice@emlaw.com>; John L. Wood <JWood@emlaw.com>; Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; jessica.malloy-thorpe@millermartin.com; jordan.scott@millermartin.com; Chuck Lee <Chuck.Lee@millermartin.com>
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Matt,

Based on the parties' meet and confers about SNMPR's Rule 30(b)(6) notice (served on October 31, 2023), and SNMPR's proposed narrowing of certain deposition topics, Extreme is willing to designate witnesses for the following topics:

Topic Nos. 1, 4, 7, 8, 9, 12, 16, 21, 22, 23, 25, 26, 31, 33, 34, 35, 36, 38, and 39.

Our deponents will be designated subject to Extreme's objections and scope stated in its response to SNMPR's Rule 30(b)(6) notice. We are working on finding availability of our provisional deponents and expect to provide some dates by Friday, December 22. We are working on making some deponents available around January 15, 2024 and thereafter. At this time, subject to deponents' availability, we expect to designate between 5-6 deponents.

Extreme will not designate deponents for the remaining topics: Topic Nos. 2, 3, 5, 6, 10, 11, 13, 14, 15, 18, 19, 20, 24, 27, 28, 29, 30, 32, 37, and 40. Please let us know if SNMPR will agree to drop all or some of these topics. For the topics that SNMPR will not drop, please let us know if you propose any narrowing of the topics.

We would consider designating deponents for topics 13 and 14 if SNMPR agrees to narrow the topics consistent with Extreme's response. Extreme will also consider designating a deponent for topic no. 18, if SNMPR narrows it to make it relevant to the issues in this case. Please let us know your position by 12/22 so that we can jointly approach the Court.

With respect to your inquiry about Extreme's initial disclosure, we plan to serve our updated initial disclosures during the week of January 2. While Plaintiffs have purportedly served updated initial disclosures, we do not think that under FRCP 26(a)(1) and the Court's May 3, 2023 order (ECF No. 306), a combined initial disclosure by two separate parties, SNMP Research, Inc. and SNMP Research International, Inc., is proper. Therefore, we request that SNMP Research, Inc. and SNMP Research International, Inc., who have purported to be separate parties, should serve separate initial disclosures.

Best regards,

Saurabh Prabhakar (he/him/his) | Associate | Debevoise & Plimpton LLP | sprabhak@debevoise.com | +1 415 738 5730 | www.debevoise.com

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From: Ashley, Matt <MAshley@irell.com>

Sent: Tuesday, December 19, 2023 8:59 AM

To: Prabhakar, Saurabh <sprabhakar@debevoise.com>

Cc: Weber, Olivia <oweber@irell.com>; Cheryl G. Rice <CRice@emlaw.com>; John L. Wood <JWood@emlaw.com>;

Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; jessica.malloy-thorpe@millermartin.com;

jordan.scott@millermartin.com; Chuck Lee <Chuck.Lee@millermartin.com>

Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

EXTERNAL

Saurabh,

It does not take 2.5 months to schedule a 30(b)(6) deposition, and it certainly is not proceeding "with urgency." The delay and Extreme's unwillingness to even now commit to a deposition within that time frame speaks for itself. As for the topics, they are not remotely as you characterize them, as the Court will see if it wants to review them. Nor is your timeline regarding production correct, particularly given that Extreme has on multiple occasions claimed its production was "substantially complete" only to produce materially more documents in the future (after being pressed by Plaintiffs on deficiencies).

It also bears noting that on every meet and confer call on these topics, Extreme's tactic has been not to reach any actual agreement, but to "take it back to my team" to discuss, only to then delay further in responding.

As for our request to extend Plaintiffs' opening report deadline to the same date as Extreme's opening report deadline, your only response is that "your proposal that Extreme should have less time for its expert reports is inappropriate." In fact, our proposal does not change any of Extreme's time to file its expert reports. Its opening expert report deadline remains the same, and rebuttals have always been due thirty days after opening reports. Moreover, your suggestion that Extreme should get an extension makes no sense. Extreme has no basis for even requesting one, and the past extensions have shown that Extreme just continues to delay until the extended date. With opening reports due at the same time (and rebuttal reports due at the same time), we suspect and expect that Extreme will self-correct that approach.

Regards,

Matt

From: Prabhakar, Saurabh <sprabhakar@debevoise.com>
Sent: Monday, December 18, 2023 8:19 PM
To: Ashley, Matt <MAshley@irell.com>
Cc: Weber, Olivia <oweber@irell.com>; Cheryl G. Rice <CRice@emlaw.com>; John L. Wood <JWood@emlaw.com>; Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; jessica.malloy-thorpe@millermartin.com; jordan.scott@millermartin.com; Chuck Lee <Chuck.Lee@millermartin.com>
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Matt,

We understand that Plaintiffs are eager to get depositions on calendar and we are working with Extreme with urgency to get them scheduled. But for the reasons below, Plaintiffs' demand for dates by today is unreasonable and not possible.

As an initial matter, Plaintiffs' 30b6 notice was served on October 31, 2023 (practically November), months after Extreme had finished producing documents. Plaintiffs' deposition notice was also extraordinarily broad and onerous; Plaintiffs' forty topics, as served originally, would have required Extreme to spend months preparing witnesses to the near-encyclopedic knowledge that many of the topics sought. In mid-November, counsel for Extreme started meeting and conferring with counsel for Plaintiffs regarding the scope of the topics so that Extreme could assess next steps. That process completed just last week, on December 12, when we had finally met and conferred on all the topics.

Since then we have been actively working with Extreme (1) to determine which of SNMPR's forty, broad topics are now unobjectionable, which topics we think need further narrowing, which topics for which we may move for a protective order from the Court, and (2) to identify witnesses who can cover the topics. We then have to work with these witnesses to find their availability for preparation as persons most knowledgeable. Many of the objectionable topics span multiple witnesses, which further complicate the logistics while we continue to meet and confer. That said, we have been working diligently to get these things done before Extreme personnel take their holiday break. But Plaintiffs' expectations that all these tasks can be accomplished in five days after finishing meeting and conferring is unreasonable.

Extreme is willing to discuss mutual extensions to the schedule. Please let us know if you would like to have that discussion. But your proposal that somehow Extreme should have less time for its expert reports is inappropriate. If SNMPR is unwilling to wait for a few more days while Extreme gets back to it regarding the topics, what issues remain in dispute, and witness availability, please send us a draft joint email to the Court for our review.

Best regards,

Saurabh Prabhakar (he/him/his) | Associate | Debevoise & Plimpton LLP | sprabhak@debevoise.com | +1 415 738 5730 | www.debevoise.com

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From: Ashley, Matt <MAshley@irell.com>
Sent: Monday, December 18, 2023 1:43 PM
To: Prabhakar, Saurabh <sprabhakar@debevoise.com>
Cc: Weber, Olivia <oweber@irell.com>; Cheryl G. Rice <CRice@emlaw.com>; John L. Wood <JWood@emlaw.com>; Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; jessica.malloy-thorpe@millermartin.com

thorpe@millermartin.com; jordan.scott@millermartin.com; Chuck Lee <Chuck.Lee@millermartin.com>

Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

EXTERNAL

Saurabh,

We sent the 30b6 notice to Extreme in October and have been asking Extreme for dates ever since to no avail. Absent dates provided today, with those dates occurring by no later than mid-January, we will raise the issue with the Court. And given the delay thus far, we will also request that Plaintiffs' opening expert deadline be moved out one month to the same date Extreme's opening expert deadline currently is (please let us know if Extreme is amenable to stipulating to this, as it may avoid Court involvement, depending upon the 30b6 deposition dates that Extreme provides us). To the extent the deposition is delayed beyond mid-January, we will ask for additional time for Plaintiffs' expert opening reports (beyond the 30 days) and that the extra time be taken from Extreme's time to file rebuttal reports.

Matt

From: Ashley, Matt <MAshley@irell.com>

Sent: Saturday, December 16, 2023 6:12 AM

To: Prabhakar, Saurabh <sprabhakar@debevoise.com>

Cc: Weber, Olivia <oweber@irell.com>; Cheryl G. Rice <CRice@emlaw.com>; John L. Wood <JWood@emlaw.com>;

Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; jessica.malloy-thorpe@millermartin.com; jordan.scott@millermartin.com; Chuck Lee <Chuck.Lee@millermartin.com>

Subject: Re: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Saurabh,

As we discussed, Plaintiffs need to see the witnesses Extreme discloses in its supplemental initial disclosures to know the extent of deviation from the FRCP. Can Extreme update by Monday? We sent ours yesterday.

Also we need to secure dates for the 30b6, which was served in October. Can you please provide available dates Monday? We don't want calendars filling up.

On Dec 15, 2023, at 9:55 PM, Prabhakar, Saurabh <sprabhakar@debevoise.com> wrote:

Olivia,

We are working through your positions with our client. We expect to respond by Wednesday, December 20, 2023. We are also waiting for SNMPR's position regarding any deviation from the default limits on depositions. Please provide that it so that we can consider that before offering witnesses.

Best,

Saurabh Prabhakar (he/him/his) | Associate | Debevoise & Plimpton LLP | sprabhak@debevoise.com | [+1 415 738 5730](tel:+14157385730) | www.debevoise.com

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From: Weber, Olivia <oweber@irell.com>
Sent: Friday, December 15, 2023 1:47 PM
To: Prabhakar, Saurabh <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>
Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Weber, Olivia <oweber@irell.com>
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

EXTERNAL

Hi Saurabh,

Could you please provide today your client's positions on the topics we discussed?

As discussed, could you please also send the available dates for deposition in December and the first two weeks of January? We want to work with you, but the delay is causing us difficulty given our expert report opening deadline.

Thanks,

Olivia
(949) 760-5146

From: Weber, Olivia
Sent: Tuesday, December 12, 2023 6:08 PM
To: Prabhakar, Saurabh <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>
Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Weber, Olivia <OWeber@irell.com>
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Hi Saurabh,

Following up on our call today – to clarify as to Topic 40, we are asking that each designated witness be prepared to identify the person(s) at Extreme with the most knowledge regarding the subject of the topic(s) for which that witness is designated.

Best,

Olivia
(949) 760-5146

From: Weber, Olivia
Sent: Tuesday, December 12, 2023 10:36 AM
To: 'Prabhakar, Saurabh' <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>
Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>;

'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>;
'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee'
<Chuck.Lee@millermartin.com>; Weber, Olivia <OWeber@irell.com>
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Hi Saurabh,

Because you said you were available after 2, we will go ahead and push the call back to 2:15 to give us a few extra minutes to discuss the 30(b)(6).

Please confirm that we will have Extreme's positions on the 30(b)(6) notice by Thursday. As mentioned in my prior email, we need to get the depositions scheduled.

Best,

Olivia
(949) 760-5146

From: Prabhakar, Saurabh <sprabhakar@debevoise.com>
Sent: Tuesday, December 12, 2023 10:23 AM
To: Weber, Olivia <oweber@irell.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>
Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Olivia,

We proposed after 2 pm today because the Court has asked the parties to submit an update by tomorrow.

After we finish meeting and conferring on the privilege brief issue, Extreme is willing to discuss the remaining three topics on the 30(b)(6) notice. I have availability for 30 minutes only but I can stay a few minutes longer if that allows us to finish discussion on the remaining three topics. For the topics we discussed just two days ago, we need time consult with our client and respond with our position.

Best,

Saurabh Prabhakar (he/him/his) | Associate | Debevoise & Plimpton LLP | sprabhak@debevoise.com | +1 415 738 5730 | www.debevoise.com

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From: Weber, Olivia <oweber@irell.com>
Sent: Tuesday, December 12, 2023 9:31 AM
To: Prabhakar, Saurabh <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>

Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Weber, Olivia <oweber@irell.com>
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

EXTERNAL

Hi Saurabh,

I am following up on my email below. On our last call, we asked for your availability on Monday, and you asked for Tuesday, for which we gave you wide open availability. We would like to finish up our call so that we can get the depositions scheduled.

We understand from a separate email that you are available after 2pm today, so we will go ahead and schedule our call for 2:30 Pacific. At that time, we can also discuss the privilege brief issue.

Best,

Olivia
(949) 760-5146

From: Weber, Olivia
Sent: Monday, December 11, 2023 12:50 PM
To: Prabhakar, Saurabh <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>
Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Maddern, Jonathon <jmaddern@irell.com>; Weber, Olivia <OWeber@irell.com>
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Hi Saurabh,

Below are the word changes to the topics that we've discussed along with the revised definition of "Complete Basis." In addition, we've included corresponding word changes to Topics 1-3 and 5, for which we're willing to remove the same "but not limited to" language as the other topics. As discussed on our Friday call, we will follow up later with more detailed requests to narrow down Topic 18. Please let us know your availability to speak further tomorrow.

1. "Complete Basis" means and refers to the identity and comprehensive description of ~~legal and~~ factual bases, including the Identity of all Persons with knowledge of the factual bases and the Identity of all evidence, including Documents (by production number), oral statements, and witnesses that relate to it.

Topic No.	Plaintiffs' Proposed Changes

1	The sale of Brocade's data center business to Extreme, including but not limited to any discussion or analysis Relating to SNMP Research and/or SNMP Research Software in connection with that sale.
2	The Brocade License Agreement, including but not limited to Your interpretation of it (including §§ 2-3 & Amendment 3 § 7), the performance and alleged breach of it, and the negotiation history for it. This includes without limitation Plaintiffs' notices of breach and termination.
3	The 2001 Extreme License, including but not limited to Your interpretation of it (including §§ 2-3, 7-8, 10, 16, 24-25, & Attachment A), the performance and alleged breach of it, and the negotiation history for it. This includes without limitation SNMP Research International, Inc.'s notices of breach and termination.
5	The Enterasys License, including but not limited to Your interpretation of it (including §§ 2-3), the performance and alleged breach of it, and the negotiation history for it. This includes without limitation SNMP Research International, Inc.'s notices of breach and termination.
8	Your request(s) for Licenses or assignments/transfers/amendments of Licenses from SNMP Research, including without limitation why You made the requests, which Persons were involved in the requests, and any research, testing or analysis done in connection with the requests or any of SNMP Research's responses to the requests.
20	The Complete Basis for Your contention that any of SNMP Research, Inc.'s copyrights are unenforceable against Extreme. any challenge You may make as to SNMP Research, Inc.'s copyrights and/or copyright registrations, including without limitation the validity and/or accuracy of the registrations and the ownership and/or authorship of the copyrights.
21	Your Communications with Broadcom or Brocade about SNMP Research, its software, its Licenses, and/or this lawsuit, and/or any This includes without limitation any discussions relating to actual or potential indemnification or defense.
22	Your Communications with any third party about SNMP Research, its software, its Licenses, and/or this lawsuit, and/or This includes without limitation any Communications (direct or indirect) with Your customers, direct or indirect.
23	The search You conducted to ascertain which Products at Extreme contain SNMP Research Software, including without limitation the Persons involved, and what their roles were, what they did to search, the results of the search(es), and how, when and to whom the results were communicated.
26	The process of creating any financial reports made by Extreme for production in this litigation, including the source(s) of information in such reports, the completeness of the data, the meaning of the data, and the process by which the accuracy of the data was verified.
31	Your Source Code for the operating system software contained in the Products identified in Extreme's responses to SNMP Research Inc.'s Interrogatory numbers 1 and 2, and including without limitation when, where and how it is maintained, developed, and inserted into the Products and subsequently updated.

32	<p>The source, possession, and custody of every copy (including without limitation every identical copy) of Source Code containing SNMP Research Software. This includes, without limitation:</p> <ul style="list-style-type: none"> a. All electronic devices and optical media on which every copy of this Source Code is or was ever stored at Extreme or by an Extreme employee or contractor, including hard drives, thumb drives, CDs, DVDs, PDAs, smartphones, tablets, personal and work computers, personal or work email accounts, in addition to the corresponding custodian of each device; b. All servers, source code repository systems, and databases in which this Source Code is or was stored; c. When and by whom this Source Code was first copied, created, or obtained at Extreme; d. All Extreme employees, past and present, who accessed, transferred, copied, or modified any of this Source Code at any time; e. When, by whom, and under what circumstances this Source Code was copied or deleted; f. The existence and contents of any log information showing the creation, editing, metadata accessing, metadata editing, and/or deletion of this Source Code.
35	<p>The royalty system used to track royalty amounts owed for your Products and your policies, practices, and procedures for determining and reporting royalties for shipped Products and efforts to do so, and including but not limited to, all efforts taken to determine and report royalties for the Products identified in response to SNMP Research Inc.'s Interrogatory number 1 and 2.</p>
37	<p>The development of Management Information Base objects in each release of EXOS software that contains SNMP Research Software.</p>

Best,

Olivia
(949) 760-5146

From: Weber, Olivia <oweber@irell.com>
Sent: Monday, December 11, 2023 11:22 AM
To: Prabhakar, Saurabh <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>
Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Maddern, Jonathon <jmaddern@irell.com>; Weber, Olivia <oweber@irell.com>
Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Hi Saurabh, I am following up on my email below. When you get a moment, could you please confirm what time works for a call tomorrow regarding the 30(b)(6)? Thank you.

Best,

Olivia
(949) 760-5146

From: Weber, Olivia

Sent: Friday, December 8, 2023 5:47 PM

To: Prabhakar, Saurabh <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>

Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Maddern, Jonathon <jmaddern@irell.com>; Weber, Olivia <OWeber@irell.com>

Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Saurabh,

We are generally available for a call on Tuesday regarding the 30(b)(6) notice. Please let us know what times work for you.

Best,

Olivia

(949) 760-5146

From: Weber, Olivia <oweber@irell.com>

Sent: Tuesday, December 5, 2023 9:33 AM

To: Prabhakar, Saurabh <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>

Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Maddern, Jonathon <jmaddern@irell.com>; Weber, Olivia <oweber@irell.com>

Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Thanks, Saurabh. We'll send a calendar invite.

Olivia

(949) 760-5146

From: Prabhakar, Saurabh <sprabhakar@debevoise.com>

Sent: Tuesday, December 5, 2023 2:58 AM

To: Weber, Olivia <oweber@irell.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>

Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Maddern, Jonathon <jmaddern@irell.com>

Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

Olivia,

To continue the parties' meet and confer about Plaintiffs' Rule 30(b)(6) topics, Extreme is available on Friday, December 8 from 10 am – 12 pm PT.

Best,

Saurabh Prabhakar (he/him/his) | Associate | Debevoise & Plimpton LLP | sprabhak@debevoise.com | [+1 415 738 5730](tel:+14157385730) | www.debevoise.com

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The latest version of our Privacy Policy, which includes information about how we collect, use and protect personal data, is at www.debevoise.com.

From: Weber, Olivia <oweber@irell.com>

Sent: Friday, December 1, 2023 7:53 PM

To: Prabhakar, Saurabh <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>

Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Maddern, Jonathon <jmaddern@irell.com>; Weber, Olivia <oweber@irell.com>

Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery

EXTERNAL

Saurabh,

I write concerning Extreme's request regarding separate privilege logs and our discussion on our Nov. 20 call. Plaintiffs agree to separately identify the privilege as to each Plaintiff and will also update the logs as we stated we would in our response letter (and as discussed on our call last week). We'll serve a revised log by December 22.

On our Nov. 20 call, you represented that Extreme would get back to us by December 1 with an explanation for the missing product numbers from Appendices E-G. You were also going to send (by today) search terms for Plaintiffs' consideration. Please confirm you will still send that information today, as well as provide Extreme's availability for additional calls early next week.

Best,

Olivia
(949) 760-5146

From: Weber, Olivia

Sent: Tuesday, November 28, 2023 7:55 AM

To: 'Prabhakar, Saurabh' <sprabhakar@debevoise.com>; Ashley, Matt <MAshley@irell.com>; 'Cheryl G. Rice' <CRice@emlaw.com>; 'John L. Wood' <JWood@emlaw.com>

Cc: Extreme <Extreme@debevoise.com>; Leslie A. Demers <Leslie.Demers@skadden.com>; 'jessica.malloy-thorpe@millermartin.com' <jessica.malloy-thorpe@millermartin.com>; 'jordan.scott@millermartin.com' <jordan.scott@millermartin.com>; 'Chuck Lee' <Chuck.Lee@millermartin.com>; Maddern, Jonathon <jmaddern@irell.com>; Weber, Olivia <OWeber@irell.com>

Subject: RE: SNMP Research, Inc., et al. v. Broadcom Inc., et al. - Discovery